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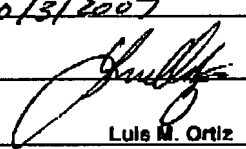
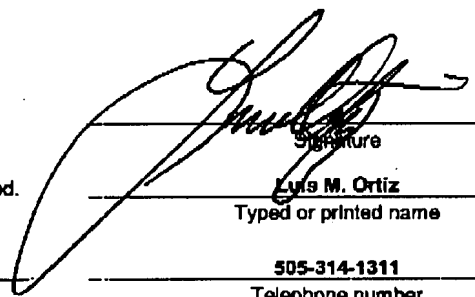
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PRE-APPEAL BRIEF REQUEST FOR REVIEW		Docket Number (Optional) 1000-1306	
I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.102 1.102] <i>Faxed 571 273 8300</i> on <u>10/3/2007</u> Signature  Typed or printed name <u>Luis M. Ortiz</u>		Application Number 10/620,098 Filed 07/14/2003 First Named Inventor Luis M. Ortiz Art Unit 2622 Examiner Selby, Gevell V.	
Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request. This request is being filed with a notice of appeal. The review is requested for the reason(s) stated on the attached sheet(s). Note: No more than five (5) pages may be provided.			
I am the <input checked="" type="checkbox"/> applicant/inventor. <input type="checkbox"/> assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96) <input checked="" type="checkbox"/> attorney or agent of record. Registration number <u>35,230</u> <input type="checkbox"/> attorney or agent acting under 37 CFR 1.34. Registration number if acting under 37 CFR 1.34 _____		 Signature <u>Luis M. Ortiz</u> Typed or printed name <u>505-314-1311</u> Telephone number <u>10/3/2007</u> Date	
NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.			
<input checked="" type="checkbox"/> Total of <u>4</u> forms are submitted.			

This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT: Luis M. Ortiz **EXAMINER:** Selby, Gevell V.
SERIAL NO.: 10/620,098 **GROUP:** 2622
FILED: 07/14/2003 **ATTY DKT NO.:** 1000-1306
TITLE: **Providing multiple synchronized camera views for
broadcast from a live venue activity to remote viewers**

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REASONS FOR PRE-APPEAL BRIEF REQUEST FOR REVIEW

Dear Sir:

In response to the Final Office Action dated July 12, 2007 and in support of the "Pre-Appeal Brief Request for Review" in the above captioned matter, Applicant submits that his remarks and amendments presented in the response dated April 20, 2007, particularly regarding independent claims 1, 33 and 65, should have been persuasive, remain persuasive when compared to the cited art of record, and place the claims in condition for allowance. Applicant believes that the Examiner erred in not recognizing clear distinctions between the claimed invention and the cited art. For these reasons, Applicant seeks a Pre-Appeal Brief Request for Review.

Claims 1-4, 6, 13, 14, 15, 16, 18-24, 25, 33-38, 44-48, 50-58, 65-70, 74-80 and 83-85 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Anderson, Jr. et al.*, 6,579,203 ("*Anderson*"), in view of *Paff*, US 5,164,827. Claims 7, 9, 10, 39, 40, 42, and 71-73 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Anderson* in view of *Paff* as applied to independent claims 1, 33 and 65, and further in view of *Narayanaswami*, US 6,657,654.

Applicant's request for review will only focus on the independent claims in this application, which have already been identified as 1, 33 and 65.

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For the following reasons, the rejection of Independent claims 1, 33 and 65 should have been overcome given Applicant's after submission of the April 20, 2007, reply and amendment. Applicant believes the record supports a reversal of the rejection if appeal becomes necessary.

Applicant's independent claim 1 is directed to each and every one of the following method claim elements:

simultaneously capturing at least two arena camera views of a live entertainment activity in an arena using a primary camera and at least one slave camera located proximate to the arena wherein movement of the at least one slave camera is synchronized to movement of the primary camera enabling the primary camera and the at least one slave camera to remain focused on a similar target of interest in the arena while simultaneously capturing the at least two arena camera views;

transmitting said at least two arena camera views provided from the primary camera and the at least one slave camera to a server;

processing said at least two arena camera views at said server for display on a display screen associated with at least one remote viewer; and

enabling display of at least one arena camera view on a display screen associated with at least one remote viewer in response to user selection of said at least one arena camera view from said at least two arena camera views at the at least one remote viewer, thereby enabling a user of the at least one remote viewer to view the at least one arena camera view through said display screen associated with the remote viewer.

Applicant's independent claim 33 is directed to each and every one of the following system claim elements:

synchronized cameras including a primary camera and at least one slave camera located proximate to an arena for capturing more than one video perspective of entertainment activity in the arena, wherein the more than one video perspective of entertainment activity can be transmitted from said synchronized cameras to a server;

a server for processing the more than one video perspective of entertainment activity for display on a display screen associated with at least one remote viewer; and

a communications network for transmitting the more than one video perspective of entertainment activity to at least one remote viewer for selective display of the more than one video perspective of entertainment activity on a display screen associated with said at least one remote viewer.

Applicant's independent claim **65** is directed to each and every one of the following system claim elements:

synchronized cameras including primary camera and at least one slave camera located proximate to an arena for capturing more than one video perspective of entertainment activity in the arena, wherein the more than one video perspective of entertainment activity can be transmitted from said synchronized cameras to a server;

a server for processing the more than one video perspective of entertainment activity for display on a display screen associated with at least one hand held device physically located in the arena; and

a communications network associated with said server, wherein the more than one video perspective of entertainment activity can be communicated from said server through said communications network to said at least one and held device;

wherein the more than one video perspective of entertainment activity is displayed on said at least one display screen in response to a user selection at the at least one hand held device, thereby enabling a user of said at least one hand held device to view at least one of the more than one video perspective of entertainment activity through said at least one hand held device.

The Examiner's Final Action dated August 6, 2007, wrongfully identifies that column 2, line 66 to column 3, line 15 in *Anderson* supports the teaching or suggestion of "transmitting said at least two arena camera views provided from a least two synchronized cameras to a server." A review of these specific sections in *Anderson* does not reveal such a teaching. The Examiner then cites to column 4, lines 6-54 in *Anderson* stating "the synchronized camera[s] are considered to be the video cameras positioned around the event." Synchronization between cameras simply is not taught or suggested in *Anderson*.

Anderson also does not teach the use of a server. Therefore, *Anderson* cannot teach the use of a server to process synchronized camera views or the use of a server for any other reasons. A server is simply not taught in any of the sections cited by the Examiner, and is not taught anywhere in *Anderson*.

Paff is combined with *Anderson* for its teaching of security cameras utilizing a master-slave relationship. *Paff* purely teaches the use of master-slave cameras deployment in a typical scenario, limited to its use within a premises or business for security purposes. As with *Anderson*, *Paff* fails to teach synchronization of cameras as claimed by Applicant, and as supported in Applicant's specification, within an entertainment venue to capture video

perspective of entertainment activities. Besides its different field of application, *Paff*, like *Anderson et al*, also does not teach the use of a server, nor does *Paff* teach the use of communications networks for delivery of video from a server to remote viewers. The combination of *Anderson* with *Paff* simply does not teach or suggest the use of communications networks for delivery of video captured by synchronized cameras located within an entertainment venue from a server to remote viewers.

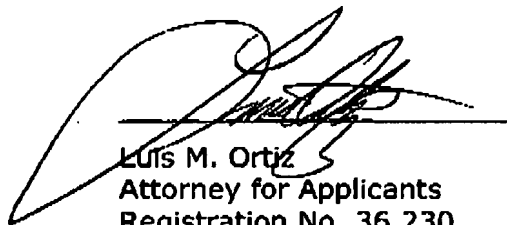
The use of *Anderson* in combination with *Paff* for the suggestion of the synchronization of camera to capture video and the processing video from synchronized cameras through a server for transmission as video data to remote viewers from the server is simply not supported as required by 35 U.S.C. §103(a).

For the foregoing reasons, independent claims 1, 33 and 65 should have been allowed after submission of the April 20, 2007, reply and amendment by Applicant. Applicant is confident that amendment of these claims together with these remarks and will support a reversal of the rejection if the application must be appealed. Applicant hopes that prosecution of his application can instead be advanced to allowance in order to avoid further unnecessary delay for both the Office and Applicant.

In view of the foregoing discussion, the Applicant respectfully requests the withdrawal of the rejections under 35 U.S.C. §103. Reconsideration and early allowance of Applicant's application is respectfully solicited.

Respectfully submitted,

Dated: October 3, 2007



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